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18 *Attorneys for Plaintiff and Counterclaim-*  
19 *Defendant High Sec Labs Ltd.*

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 HIGH SEC LABS LTD.,

23 Plaintiff,

24 v.

25 IPGARD INC.

26 SMARTAVI INC.,

27 Defendants.

Case No.: 2:20-cv-01797-MMD-NJK

**JOINT STIPULATION AND PROPOSED  
ORDER OF DISMISSAL WITH  
PREJUDICE**

28 **IT IS HEREBY STIPULATED AND AGREED**, by and between the Parties to this  
29 action, by their undersigned counsel, as follows:

30 1. That the above-captioned action is dismissed in its entirety with prejudice,  
31 pursuant to Rule 41(a) of the Federal Rules of Civil Procedure.

2. Neither party shall be entitled to, nor shall seek, an award of costs, disbursements or fees, including attorneys' fees, from the other party with respect to this action.

3. This Stipulation has been made pursuant to the terms of the Settlement Agreement between the parties dated as of October 5, 2021.

4. This Stipulation may be executed in counterparts, and each of the said counterparts shall for all purposes be deemed to be an original and in full force and effect, and all such counterparts shall together constitute one and the same instrument. A signature on this Stipulation transmitted by electronic means shall have the same effect as an original signature.

Dated: October 7, 2021

/s/ F. Christopher Austin  
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*Attorneys for Defendants*

**IT IS SO ORDERED:**

  
UNITED STATES DISTRICT JUDGE

DATED: October 7, 2021